

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

ELLENOR ZINSKI,

Plaintiff,

v.

LIBERTY UNIVERSITY, INC.,

Defendant.

Case No. 6:24-cv-00041-NKM

**MOTION TO WITHDRAW APPEARANCE OF
SAMANTHA WESTRUM AS COUNSEL FOR PLAINTIFF**

I, Eden Heilman, an attorney admitted to practice in this Court and counsel of record in the above-captioned proceeding, respectfully move for leave to allow Samantha Westrum to withdraw her appearance as counsel on behalf of Plaintiff. Ms. Westrum has terminated her employment with the ACLU Foundation of Virginia, and other attorneys at ACLU Foundation of Virginia will continue to represent Plaintiff in this matter.

WHEREFORE, pursuant to Western District of Virginia Local Civil Rule 6(i), the undersigned respectfully requests that this Court enter an order allowing Samantha Westrum to Withdraw as counsel for Plaintiff in this matter.

Date: January 30, 2025

Respectfully submitted,
/s/ Eden Heilman
Eden Heilman (VSB No. 93554)
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CERTIFICATE OF SERVICE

I, Eden Heilman, certify that on January 30, 2025, a true and correct copy of the forgoing document was filed electronically with the Clerk of Court for the U.S. District Court for the Western District of Virginia by using the CM/ECF system. I certify that all counsel in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Eden Heilman

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